



August 2, 2011

VIA ELECTRONIC MAIL

Ms. Carmen Santos
Waste Management Division
U.S. Environmental Protection Agency Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: Correction to Table 2-16 Risk Assessment/RAP
Former Sunkist Citrus Processing Plant
616 E. Sunkist Street
Ontario, California

Dear Ms. Santos:

A transcription error was identified in Table 2-16 of the Remedial Action Plan (RAP) submitted to the United States Environmental Protection Agency (EPA) on May 22, 2011. The RAP was prepared to support the application for risk-based clean-up of polychlorinated biphenyls (PCBs) in accordance with 40 *Code of Federal Regulations* (CFR) 761.61(c) of the Toxic Substances Control Act (TSCA).

A revised version of Table 2-16 is attached (Attachment A) along with the original laboratory report (Attachment B) provided by ABC Environmental Laboratories (ABC). A series of samples (AGB-12, FLI-B12, BSW-B12, LD-L1, and B-15) that were collected from the stockpiles generated during the demolition of Buildings 12 and 15 were inadvertently entered twice on Table 2-16. In addition, the associated results listed for AGB-12 and LD-L1 were entered incorrectly. The specific data entry errors for these two samples that were made to the original Table 2-16 are summarized as follows:

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Sample Identification	Reported on Table 2-16 of RAP (mg/kg)	Actual Concentration Based on ABC Report (mg/kg)
BSW-B12	26.1	0.0261
LD-L1	28.2	0.0282

The corrections to Table 2-16 do not affect the conclusions or recommendation made in the RAP and should not delay the EPA's approval process associated with the application.

If you have any questions regarding this correction, please feel free to call.

Sincerely,



Brett H. Bowyer, P.G.
Principal
Bowyer Environmental Consulting, Inc.

Attachment A

Table 2-16 (Revised)

TABLE 2-16
Additional Tasks - PCB-Related Sampling Results
Sunkist - Former Citrus Processing Plant
Ontario, CA

Sample Identification	Sample Date	Location Description	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
Building 15									
B15-A-1A	10/20/2010	Floor Concrete Interior (No Paint)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-A-1B	10/20/2010	Floor Concrete Surface (With Red Paint)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-A-2	10/20/2010	Wall Cover (Fiberglass)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-A-3A	10/20/2010	Block Wall Interior (No Paint)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-A-3B	10/20/2010	Block Wall Surface (With Yellow Paint)	<0.025	<0.050	<0.025	<0.025	<0.025	0.284	<0.025
B15-A-4	10/20/2010	Grout Between Block on Wall	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-A-5	10/20/2010	Ceiling (Wood Behind Fiberglass)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-D	10/20/2010	Oil Stained Floor (Near Drain)	<0.025	<0.050	<0.025	<0.025	<0.025	0.672	0.0902
B15-E	10/20/2010	Foam Around Piping	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-F	10/20/2010	Foam Between Wall and Steel Beam	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-G	10/20/2010	Grout Between Brick and Concrete (Outside B-15)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-H	10/20/2010	Block Wall Surface on Roof (With Blue Paint)	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-I-A	10/20/2010	Black Tar Substance On Roof	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-I-B	10/20/2010	Cardboard On Roof	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-I-C	10/20/2010	Plywood On Roof	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B15-J	10/20/2010	Grout Between Concrete Slabs - Outside of B-15	<0.025	<0.050	<0.025	<0.025	<0.025	0.374	0.0392
B15-K	10/20/2010	Grout Around Window - Outside of B-15	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B-15-C1	12/13/2010	Red Brick walls on B-15	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
Building 12									
B12-A	10/27/2010	Stained Concrete Under Gain Control - Southwest Corner of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.204	0.0615
B12-B	10/27/2010	Grout Between Cement Slabs - Middle of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.340	0.0865
B12-C	10/27/2010	Stained Concrete By Lighting Transformer - Northeast Corner of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.182	0.0903
B12-D	10/27/2010	Grout Between Floor and Wall - Ground-Level Floor, Northwest Side	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-E-1	10/27/2010	Wall Brick - Ground-Level Floor, Northwest Side	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-E-2	10/27/2010	Grout Between Wall Bricks - Ground-Level Floor, Northwest Side	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-F	10/27/2010	Wall Tile in Bathroom - Ground-Level Floor, Southeast Side	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-G	10/27/2010	Grout From Floor - Ground-Level Floor, Northwestern Room	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-H-1	10/27/2010	Cement Under Concrete Floor - Ground-Level Floor, Northwestern Room	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-H-2	10/27/2010	Concrete Floor Over Cement - Ground-Level Floor, Northwestern Room	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-I	10/27/2010	Cement Slab near Northeast Wall - Ground-Level Floor, Northwestern Room	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-J	10/27/2010	Stucco From Wall Near Elevator - Former Lobby Area	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-K	10/27/2010	Stained Concrete Under Hydraulic Tank Under Stairway - Former Lobby Area	<0.025	<0.050	<0.025	<0.025	<0.025	0.068	<0.025
B12-L	10/27/2010	Stained Concrete in Front of Garage Door - Northeast Side of 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0448	<0.025
B12-M	10/27/2010	Glue Beneath Former Carpet - Northwest Side of 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.102	<0.025
B12-N	10/27/2010	Grout From Between Brick Wall and Ceiling - Northwest Side of 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025

TABLE 2-16
Additional Tasks - PCB-Related Sampling Results
Sunkist - Former Citrus Processing Plant
Ontario, CA

Sample Identification	Sample Date	Location Description	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
B12-O	10/27/2010	Stained Concrete in Front of South Elevator - Southwest Side on 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.477	<0.025
B12-P	10/27/2010	Stained Concrete Near Gated Transformer Area - Southwest Side on 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-Q	10/27/2010	Concrete Floor - Walkway between Building 12 and 31	<0.025	<0.050	<0.025	<0.025	<0.025	0.194	<0.025
B12-R	10/27/2010	Stained Concrete in Transformer Cage - Main Room on 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-S	10/27/2010	Fiberglass Insulation on Ceiling - Main Room on 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-T	10/27/2010	White Material on Roof	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-U	10/27/2010	Stained Concrete on 1st Floor - Near Stairway to Basement	<0.025	<0.050	<0.025	<0.025	<0.025	4.90	<0.025
B12-V	11/3/2010	Stained Material on Roof of Small Building (Southeast Side of B12), Near B12-U	<0.025	<0.050	<0.025	<0.025	<0.025	0.944	<0.025
B12-B-A2	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-A3	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-A5	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0766	<0.025
B12-B-A6	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.120	<0.025
B12-B-B2	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	0.2270
B12-B-B3	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0282	0.302
B12-B-B4	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0402	0.2070
B12-B-B4G	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0352	0.2400
B12-B-B5	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0452	0.0654
B12-B-B6	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0292	0.0952
B12-B-B7	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0452	0.120
B12-B-B8	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-B9	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-C1	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-C2	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0314	0.0876
B12-B-C3	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0300	0.0941
B12-B-C4	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0466	0.115
B12-B-C5	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0278	0.0683
B12-B-C3G	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0314	0.0931
B12-B-C6	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0256	0.0558
B12-B-C7	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0262	0.0748
B12-B-D1	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0298	0.1250
B12-B-D2	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.032	0.0861
B12-B-D3	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0258	0.0859
B12-B-D4	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0432	0.151
B12-B-D5	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0534	0.1390
B12-B-E2	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.122	<0.025
B12-B-E3	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	0.0390
B12-B-E4	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0324	0.115

TABLE 2-16
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B12-B-E6	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0490	0.1090
B12-B-E7	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-F2	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0917	<0.025
B12-B-F3	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	0.0339
B12-B-F4	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.1190	<0.025
B12-B-F5	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0552	<0.025
B12-B-F7	1/27/2011	Basement Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0861	0.0385
Building 31									
B31-A	10/28/2010	Stained Concrete in Caged Area in Northwest Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.211	<0.025
B31-B	10/28/2010	Stained Concrete Outside Caged Area in Northwest Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.125	1.43
B31-C	10/28/2010	Stained Concrete Outside Caged Area in Northwest Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.0712	0.511
B31-D	10/28/2010	Grout Between Two Concrete Slabs in Northwest Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.155	0.221
B31-E	10/28/2010	Stained Concrete Behind Transformer in Northwest Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	0.0479
B31-F	10/28/2010	Stained Concrete Wall Behind Machine Near Center of North Wall	<0.025	<0.050	<0.025	<0.025	<0.025	0.259	0.0609
B31-G-1	10/28/2010	Top Of Equipment Foundation on East Side of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.419	<0.025
B31-G-2	10/28/2010	Stained Concrete near Floor of Equipment Foundation on East Side of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.145	0.142
B31-H	10/28/2010	Stained Concrete on Eastern Wall	<0.025	<0.050	<0.025	<0.025	<0.025	0.0258	<0.025
B31-I	10/28/2010	Stained Concrete in Caged Area in Southeast Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.268	0.165
B31-J-1	10/28/2010	Concrete South Wall	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B31-J-2	10/28/2010	Grout South Wall	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B31-K	10/28/2010	Stained Concrete in Southwest Area of Basement	<0.025	<0.050	<0.025	<0.025	<0.025	0.116	0.127
B31-L	10/28/2010	Stained Concrete Next to Transformers, Northwest Area - 1st Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.15	<0.025
B31-M	10/28/2010	White Wall Above B31-L, Northwest Area - 1st Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.111	<0.025
B31-N	10/28/2010	Stained Concrete Enclosed Area, Middle Part of 1st Floor	<0.025	<0.050	<0.025	<0.025	<0.025	1.07	0.157
B31-O	10/28/2010	Stained Concrete near Small Elevator, South Side of 1st Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.0513	<0.025
B31-P	10/28/2010	Stained Concrete Next to Drain and 1.0 foot Wall, Southeast Corner - 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.329	<0.025
B31-Q	10/28/2010	Red Paint on East Side Floor - 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.288	<0.025
B31-R	10/28/2010	Stained Concrete Next to Electric Switches along South Wall - 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.417	<0.025
B31-S	10/28/2010	Stained Concrete Next to Electric Switches in Northwest Corner - 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.18	<0.025
B31-T	10/28/2010	Grout Under Electric Switches on Central Part of North Wall - 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.121	<0.025
B31-U	10/28/2010	Stained Concrete in Caged Area in Northeast Area - 2nd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	3.80	<0.025
B31-V	10/28/2010	Stained Concrete at Low Spot Near Drain, South Side - 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.463	<0.025
B31-W	10/28/2010	Stained Concrete Near Electric Switches/Transformer, Northwest Side - 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.941	<0.025
B31-X	10/28/2010	Stained Concrete Near Electric Switches, Northeast Side - 3rd Floor	<0.025	<0.050	<0.025	<0.025	<0.025	0.511	<0.025
B31-Y	10/28/2010	Stained Roofing on Eastside of Roof	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025

TABLE 2-16
Additional Tasks - PCB-Related Sampling Results
Sunkist - Former Citrus Processing Plant
Ontario, CA

Sample Identification	Sample Date	Location Description	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260
Building 54									
B-54-A	10/29/2010	Brown, Lightweight, Foam-Like Material Found Under Foundation	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
Waste Water Treatment Plant									
WW-A	10/20/2010	Black Grout Between Waste Water Treatment Concrete Slabs	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	19.89
Soil Under Building 12 Basement Floor									
B12-B-B3-S ¹ / ₂	2/17/2011	0.5 feet under basement floor beneath B12-B-B3	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-B3-S4	2/17/2011	4.0 feet under basement floor beneath B12-B-B3	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-B4-S ¹ / ₂	2/17/2011	0.5 feet under basement floor beneath B12-B-B4	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-B4-S3 ¹ / ₂	2/17/2011	3.5 feet under basement floor beneath B12-B-B4	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-B8-S ¹ / ₂	2/17/2011	0.5 feet under basement floor beneath B12-B-B8	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-B8-S5	2/17/2011	5.0 feet under basement floor beneath B12-B-B8	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-C3-S ¹ / ₂	2/17/2011	0.5 feet under basement floor beneath B12-B-C3	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-C3-S3	2/17/2011	3.0 feet under basement floor beneath B12-B-C3	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-E3-S ¹ / ₂	2/17/2011	0.5 feet under basement floor beneath B12-B-E3	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
B12-B-E3-S5	2/17/2011	5.0 feet under basement floor beneath B12-B-E3	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
Uncrushed Stockpiles									
AGB-12	12/30/2010	Uncrushed concrete from B-12 - Above-ground floor structures	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
FL1-B12	12/30/2010	Uncrushed concrete from B-12 - Ground floor structures	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025
BSW-B12	12/30/2010	Uncrushed concrete from B-12 - Basement sidewall structures	<0.025	<0.050	<0.025	<0.025	<0.025	0.0261	<0.025
LD-L1	12/30/2010	Uncrushed concrete from B-12 - Loading dock structures	<0.025	<0.050	<0.025	<0.025	<0.025	0.0282	<0.025
B-15	12/30/2010	Uncrushed concrete from B-15	<0.025	<0.050	<0.025	<0.025	<0.025	<0.025	<0.025

Notes:

Results given in milligrams per kilogram (mg/kg).
< = Not detected at or above the listed reporting limit.

Attachment B

*Laboratory Report – ABC
Environmental Laboratories*

ABC Environmental Laboratories

Mr. Brett Bowyer
Bowyer Environmental
16458 Balsa Chica St., #422
HB, CA 92649

1/12/2011

Project: Sunkist
Project Site: Sunkist
Sample Date: 12/30/2010
Lab Job No.: B10L056A

Dear Mr. Bowyer,

Enclosed please find the analytical report for the samples received by ABC Environmental Laboratories on 12/30/10 and analyzed by the following EPA methods:

EPA 8082(PCBs)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custody record attached.

ABC Environmental Laboratories is certified by the CA DHS (Certificate No.2584). Thank you for giving us the opportunity to serve you.

Please feel free to call me at (909)923-8628 if our laboratory can be of further service to you.

Respectfully,

ABC Environmental Laboratories, Inc.

Ken Zheng, M.S.
Laboratory Director



This cover letter is an integral part of this analytical report.

ABC Environmental Laboratories

Client: Bowyer Environmental

Lab Job No.: B10L056A

Project: Sunkist

Date Sampled: 12/30/2010

Project Site: Sunkist, Ontario

Date Received: 12/30/2010

Matrix: Concrete

Date Extracted: 1/11/2011

Extraction Method: EPA 3550B

Date Analyzed: 1/11/2011

Batch No.: 0111-PCB-S

Date Reported: 1/12/2011

EPA 8082 (PCBs)

Reporting Unit: µg/kg (ppb)

DILUTION FACTOR		1	1	1	1	1
LAB SAMPLE I.D.		B10L056-1	B10L056-2	B10L056-3	B10L056-4	B10L056-5
CLIENT SAMPLE I.D.		AGB-12	FLI-B12	BSW-B12	LD-L1	B-15
COMPOUND	RL					
PCB-1016	25	ND	ND	ND	ND	ND
PCB-1221	50	ND	ND	ND	ND	ND
PCB-1232	25	ND	ND	ND	ND	ND
PCB-1242	25	ND	ND	ND	ND	ND
PCB-1248	25	ND	ND	ND	ND	ND
PCB-1254	25	ND	ND	26.1	28.2	ND
PCB-1260	25	ND	ND	ND	ND	ND

ND: Not Detected (Below RL x Dilution Factor).

ABC Environmental Laboratories

EPA 8082 (PCBs) Batch QA/QC Report

Client: Bowyer Environmental
Project: Sunkist
Matrix: Soil
Batch No.: 0111-PCB-S

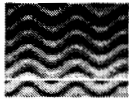
Lab Job No.: B10L056A
Lab Sample ID: LCS
Date Analyzed: 1/11/2011
Date Reported: 1/12/2011

MB/LCS/LCSD Report

Unit: ug/kg

Analyte	Method Blank	Spike Conc.	LCS	LCSD	LCS %Rec.	LCSD %Rec.	%RPD	%RPD Accept Limit	%Rec. Accept Limit
PCB-1254	ND	500	441	443	88	89	0	≤30	75-130

ND: Not Detected (Below RL).



**Former Sunkist Citrus Processing Plant Risk Assessment Review & PCB
Remediation Goals**

Patrick Wilson to: Carmen Santos

08/05/2011 06:00 PM

Good Afternoon Carmen,

We have completed our review of the human health risk assessment reports and supplemental analyses submitted in support of remedial activities taken at the Former Sunkist Citrus Processing Facility in Ontario, Calif. As you know, this analysis was conducted by Bowyer Environmental Consulting for the property located at 616 Sunkist Street in Ontario. The objectives of the analysis were to assess the likelihood and magnitude of human health impacts from exposure to site-related contaminants. In addition, the risk analysis was designed to establish site-specific cleanup concentrations for impacted media which is considerate and protective of the receptor-specific exposure scenarios applied to this site.

This site is contaminated with a broad suite of environmental contaminants. U.S. EPA has retained direct authority over the assessment & cleanup of media impacted by polychlorinated biphenyls (PCBs). Media contaminated by other chemical constituents is regulated by the Hazardous Materials Division - Site Remediation/Local Oversight Program San Bernardino County Fire Department. This local agency receives technical risk assessment support from California-EPA's Office of Environmental Health Hazard Assessment (OEHHA).

As you know, the risk analysis in support of PCB impacted media has undergone several revisions. A number of these revisions have been a direct result of meetings, site visits and conference calls between representatives of Sunkist & EPA. For instance, EPA has recommended that Sunkist sample impacted media and subject it to analysis for the dioxin-like or coplanar PCB congener fraction in order to better characterize the full dimension of risk. As a result, a subset of PCB samples were analyzed not only based upon their aroclor composition, but also for their dioxin-like or coplanar congener content. In addition, EPA has recommended that the industrial worker exposure scenario remain considerate of the entire fraction of contaminated crushed concrete - rather than the 50% exposure fraction initially proposed. These examples are illustrative of specific procedural & methodological recommendations which ultimately resulted in a more conservative estimate of putative impacts and a more conservative cleanup goal.

Our review has found that the revised PCB cleanup concentration of 4.5 mg/kg for on-site soils and concrete is indeed, considerate & protective of the residential, industrial and construction worker exposure scenarios evaluated for receptors proximate to the site. We have independently confirmed the scenario-specific risk estimates for both the cancer endpoint and the non-cancer or systemically-toxic hazard characterization. We have found & confirmed that the carcinogenic risk from exposure to PCB impacted soils & concrete does not exceed Cal-EPA's Department of Toxic Substances Control (DTSC) risk management acceptability criteria for industrial sites of $1E-5$. We have also confirmed that the non-cancer hazard from exposure to impacted media at the cleanup goal does not exceed the risk management acceptability criteria of unity (1).

Sunkist has conducted a number of removal operations at the site for impacted soils and concrete. The resulting exposure point concentration (EPC), or more accurately distribution-specific upper confidence limit on the mean (UCL), should therefore not exceed the proposed cleanup goal of 4.5 ppm total PCBs aroclors. It should be noted that this cleanup goal is germane to impacted media remaining on-site and protective of on-site workers consistent with a site-specific industrial exposure scenario(s). Off-site residents located directly adjacent to the former facility are also considered receptors subject to a number of complete exposure pathways. Potential impacts to this receptor group was assessed by application of an Agency-unapproved air dispersion model which estimated the fraction of contaminated dust impacting residential locations. We believe this model is inherently uncertain, has not been subject to Agency approval or validation, yet is likely to overestimate the fraction of dust impacting residential receptors because of the stability class input applied, and because of the plume dispersion characteristics unique to

Talk
to
Patrick
regarding
exposure model.

this model. We strongly recommend that any and all future modelling efforts in this regard be conducted with the Agency's preferred and recommended air dispersion & deposition model, *AERMOD*.

1. A. 5-2-2.

2. 5-2-2.

3. 5-2-2.